

UNITED STATES DISTRICT COURT
for the
Eastern District of Wisconsin

United States of America)
v.
KOWOKY MALDONADO, dob XX/XX/1982)

Case No. 22-M-691

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about July 14, 2020 in the county of Winnebago in the

Eastern District of Wisconsin, the defendant(s) violated:

Code Section

18 U.S.C. Sections 1028(a)(2) and
(b)(1)(A)(i)

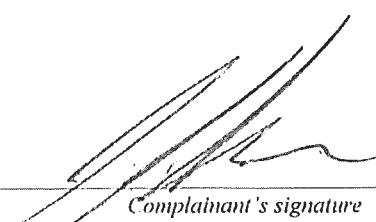
Offense Description

On or about July 14, 2020, in the State and Eastern District of Wisconsin, Kowoky Maldonado knowingly transferred a false identification document, knowing that such document was produced without lawful authority, the transfer of which was in and affected interstate and foreign commerce, to wit, the document appeared to be an identification document issued by and under the authority of the United States, in violation of Title 18, United States Code, Sections 1028(a)(2) and (b)(1)(A)(i).

This criminal complaint is based on these facts:

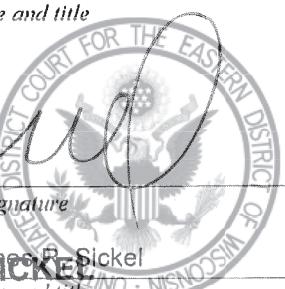
See attached Affidavit.

Continued on the attached sheet.



HSI Special Agent Ian House

Printed name and title



Sworn to before me and signed in my presence.

Date: 6/23/2022

City and state: Green Bay, Wisconsin

Honorable James R. Sickel

JAMES R. SICKEL
U.S. MAGISTRATE JUDGE

Printed name and title

AFFIDAVIT IN SUPPORT OF
A CRIMINAL COMPLAINT AND ARREST WARRANT

I, Ian House, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I make this affidavit in support of a criminal complaint charging Kowoky Maldonado with Title 18 United States Code, Section 1028(a)(2) and (b)(1)(A)(i), Fraudulent Transfer of a False Identification Document; and an arrest warrant.

2. I am a Special Agent with Homeland Security Investigations and have been since 2008. Homeland Security Investigations (HSI), under Immigration and Customs Enforcement (ICE), comprised of the former United States Immigration and Naturalization Service (INS) and United States Customs Service. I am currently assigned to the HSI Office of the Resident Agent in Charge (RAC) in Milwaukee, Wisconsin. As a Special Agent with HSI, I am authorized to investigate violations of the criminal laws of the United States, and as a law enforcement officer for the United States, I am empowered by law to conduct investigations of, and to make arrests for, federal felony offenses.

3. Since 2011, I have worked with the Greater Milwaukee Human Trafficking Task Force. In my current employment, I am assigned to investigate alleged violations of the Immigration and Nationality Act (INA) and human trafficking offenses. This includes the enforcement of laws prohibiting the unlawful entry of foreign nationals for the purpose of human trafficking, conducting immoral acts, harboring of illegal aliens for financial gain, narcotics distribution, and money laundering. I have also successfully investigated and arrested several foreign nationals who operated multiple complex counterfeit documents distribution operations. I also assisted the prosecutors in convicting these individuals on various counterfeit document related violations of federal law.

4. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other law enforcement officers and witnesses. This affidavit is intended to show simply that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

5. Based on the facts as set forth in this affidavit, there is probable cause to charge Kowoky Maldonado with Title 18 United States Code, Section 1028(a)(2) and (b)(1)(A)(i), Fraudulent Transfer of a False Identification Document.

PROBABLE CAUSE

6. On July 20, 2020, the Seymour Police Department Investigator TJ Hilgenberg was contacted by the De Pere Police Department, who received a fraud complaint from a woman who discovered that someone named Jose Ordonez-Gonzalez was unlawfully using her Social Security number at a business named Performance Pallet, located in Seymour, Wisconsin. The victim discovered this when she was denied unemployment benefits when she applied due to the COVID - 19 pandemic.

7. Investigator TJ Hilgenberg contacted Performance Pallet and discovered that Jose Ordonez-Gonzalez was, indeed, using the woman's Social Security number. It was determined that Ordonez-Gonzalez also provided his employer with a second Social Security number that did not belong to him.

8. On or about September 15, 2020, Investigator TJ Hilgenberg, along with law enforcement officers with the De Pere Police Department, executed a state search warrant at Ordonez-Gonzalez's residence located in De Pere, Wisconsin. They seized the two counterfeit Social Security cards used by Ordonez-Gonzalez to obtain unauthorized employment, along with his cell phone. Investigator TJ Hilgenberg interviewed Ordonez-Gonzalez's wife, who informed them she was aware that he used the counterfeit Social Security cards. Investigator TJ Hilgenberg

located and arrested Ordonez-Gonzalez for two counts of violating Wisconsin State Statute Sec. 943.241(2)(a) relating to Unauthorized Use of a Person's Identity.

9. On or about September 24, 2020, Investigator TJ Hilgenberg secured a state search warrant for the contents of Ordonez-Gonzalez's cell phone. On or about October 8, 2020, Investigator TJ Hilgenberg Department received the contents of the cell phone. Investigator TJ Hilgenberg discovered several conversations detailing Ordonez-Gonzalez's search for a counterfeit document vendor. Ordonez-Gonzalez eventually discovered someone who could deliver a counterfeit document to him using the cell phone number (920) 858-0479, a cell phone number provided by U.S. Cellular. Ordonez-Gonzalez and the user of the cell phone number (920) 858-0479 discussed the ordering and purchase of a counterfeit document, then the time and location to complete the delivery of the document.

10. On or about October 27, 2020, Investigator TJ Hilgenberg secured a state search warrant for the subscriber information of the user of cell phone number (920) 858-0479, to include billing information and cell tower information to be served to U.S. Cellular. Investigator TJ Hilgenberg received a response on December 11, 2020, from U.S. Cellular. He discovered that Kowoky Maldonado was the registered user to that phone number. Investigator TJ Hilgenberg discovered, through analysis of the cell tower information, that Kowoky Maldonado resides in Menasha, WI and is employed in Manitowoc, WI. He also discovered a Gmail email address assigned to Maldonado. I confirmed that Kowoky Maldonado is an undocumented noncitizen.

11. On or about December 17, 2020, Investigator TJ Hilgenberg secured a state search warrant for the contents of Maldonado's Gmail account. On or about March 6 and 10, 2021, Investigator TJ Hilgenberg received responses from Google, Inc. stating they have completed their searches of their information. In searching information on Maldonado's Gmail account, Investigator TJ Hilgenberg discovered hundreds of photos of individuals who ordered counterfeit

documents from Maldonado, along with photos of the documents. I queried the Alien File Numbers ("A-Files"), which are numbered files maintained by the U.S. Citizenship and Immigration Service used to document foreign nationals for adverse actions or filing of applications for immigration benefits. I discovered that none of the names associated with the A-File numbers matched the names printed on the documents.

12. On or about April 7, 2021, Ordonez-Gonzalez provided a voluntary statement to law enforcement, receiving no promises of consideration in return. Ordonez-Gonzalez stated that he was provided a cell phone number to call to order and purchase a counterfeit Social Security card at the cost of \$70. Ordonez-Gonzalez was handed a photo lineup and selected a photo of Kowoky Maldonado as the person who he met to purchase the counterfeit Social Security card. Ordonez-Gonzalez informed law enforcement he purchased and received the counterfeit Social Security card from Kowoky Maldonado within Kowoky Maldonado's vehicle, which he described as a white Chevrolet Cruze. The transfer of the fraudulent Social Security card occurred in the Eastern District of Wisconsin.

13. Ordonez-Gonzalez's statements were corroborated by subsequent search warrants. Investigators confirmed that on July 13, 2020, Ordonez-Gonzalez communicated with (920) 858-0479, a phone number assigned to Kowoky Maldonado, regarding the acquisition of a fraudulent Social Security Card. Subsequent cell site information showed Maldonado's phone location near the location where the transaction with Ordonez-Gonzalez took place on July 14, 2020. The same cell site information showed that Maldonado's phone was frequently located near a business in Manitowoc, Wisconsin, where investigators confirmed he worked.

14. On or about June 30, 2021, I was conducting surveillance outside of Kowoky Maldonado's known residence in Menasha, WI. I observed a white Chevrolet Cruze parked outside his apartment complex. I was able to confirm with Investigator TJ Hilgenberg that it

matched the same vehicle and registration that law enforcement had previously reported as being driven by Kowoky Maldonado.

15. On or about August 5, 2021, Ordonez-Gonzalez, at the request of law enforcement, contacted Maldonado via text message to inquire whether Maldonado was continuing to create and distribute counterfeit documents. Ordonez-Gonzalez stated that he knew of an associate that was looking for someone to help his friend like Maldonado helped him in the past. Maldonado told to Ordonez-Gonzalez that he would be willing to help his friend.

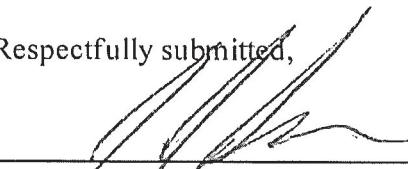
16. Based upon my training, experience, and investigation in this case, it is probable to believe that Kowoky Maldonado sells counterfeit identification documents. During the search warrant in December of 2020, Investigator Hilgenberg located hundreds of photographs of individuals who purchased counterfeit identification documents from Kowoky Maldonado. Therefore, it is probable to believe that Kowoky Maldonado's operation is popular and significant in quantity. Based upon Kowoky Maldonado's recent statements to Ordonez-Gonzalez, it is probable to believe that the operation is ongoing.

CONCLUSION

17. Based on the forgoing, it is probable to believe that on or about July 14, 2020, in the State and Eastern District of Wisconsin, **KOWOKY MALDONADO** fraudulently transferred a false identification document, in violation of Title 18, United States Code, Sections 1028(a)(2) and (b)(1)(A)(i).

18. Because this affidavit is offered for the limited purpose of supporting the criminal complaint and arrest warrant for **KOWOKY MALDONADO**, I have not set forth every fact known to me regarding this incident. Rather, I have included only those facts which I believe establish probable cause.

Respectfully submitted,


IAN HOUSE
Special Agent
Homeland Security Investigations

Subscribed and sworn to before me

this 23rd day of June, 2022

